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January 27, 2012

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Standardized and Enhanced Disclosure Requirements for Television Broadcast Licensee Public Interest Obligations, MM Docket No. 00-168

Dear Ms. Dortch:

In compliance with Section 1.1206(b) of the Commission's rules, the undersigned submits this *ex parte* notice relating to the above-captioned proceeding.

On January 27, 2012, the undersigned had a conversation with Erin McGrath, Media Legal Advisor to Commissioner Robert McDowell, regarding potential action to require online filing of television stations' Public Inspection Files.

Ms. McGrath was urged to give careful scrutiny to any new requirement that stations do more than simply upload current paper public file documents to a website. Mandating a process that would ultimately lead to a national, uniform, searchable database carries extraordinary costs in equipment, software design and personnel. Since no two stations operate identically, sell the same classes of time or even share common data entry codes or protocols, this process would ultimately lead to a soviet-style standardization of the way advertising should be sold as determined by the government, as opposed to allowing sales to be driven by the market. The tail would wag the dog; reporting would drive the sales process.

Additionally, given the Commission's experience with online submissions to a website hosted by the agency, including the licensing system and simple bi-annual ownership reports, the Commission should seriously consider *not* expending the funds to develop and host a one-size-fits-all website. The sheer number of transactions multiplied by hundreds of stations filing would likely overwhelm the Government system and lead to the unintended consequence of substantial delays simply in daily updates not to mention downtime for those actually attempting to access the documents. Stations have experience in maintaining their own websites and could, with relative ease, accommodate links to filed documents including uploading scanned political files as they exist in paper form. Such a system would provide the viewing public access to what it has today if viewers visited the stations. Consideration should be given, however, to a period of time to institute any new process particularly since any such requirement would potentially need to accommodate users with disabilities requiring machine readable text.

In accordance with the Commission's rules, this *ex parte* notice is being filed electronically in the above-referenced docket. Please contact the undersigned should you have any questions regarding this matter.

Sincerely,

Jerald N. Fritz
Senior Vice President,
Legal and Strategic Affairs

cc: Erin McGrath